



**BINNALL**  
LAW GROUP

P: 703-888-1943 • F: 703-888-1930  
717 King Street, Suite 200 • Alexandria, VA 22314

**Jared Roberts**  
ASSOCIATE  
D: 571-267-1555  
E:jared@binnall.com

December 20, 2023

**VIA ECF**

Hon. Arun Subramanian  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St. Courtroom 15A  
New York, NY 10007-1312

**Re: Flynn et al, v. Cable News Network, Inc., No. 1:21-cv-02587-AS-SLC**  
**Letter-Motion to File Confidential and Highly Confidential Materials Under Seal**

Dear Judge Subramanian,

I represent Plaintiffs Jack and Leslie Flynn in the above captioned matter. Pursuant to Fed. R. Civ. P. 5.2(e) and 26(c), and the Court's Individual Practice Rule 11B, I respectfully request to file portions of Plaintiffs' Memorandum in Opposition to Defendants' Motion for Summary Judgment under seal, given that this Memorandum cites to exhibits and deposition testimony designated "confidential" or "highly confidential" by Defendants pursuant to the Parties' Confidentiality Stipulation and Protective Order (ECF No. 60).

Pursuant to the Court's Individual Practice Rule 11Ci, counsel for the Parties conferred, and Defendants consent to this motion.

Dated: December 20, 2023

Respectfully submitted,

The request is GRANTED. By January 5, 2024, Plaintiffs shall file a redacted version to be publicly available on the docket, in line with this Court's individual practices. The Clerks of Court is directed to close ECF 196 and 199.  
SO ORDERED.

/s/ Jared Roberts  
Jared J. Roberts, *pro hac vice*  
BINNALL LAW GROUP, PLLC  
717 King Street, Suite 200  
Alexandria, Virginia 22314  
Tel: (703) 888-1943  
Fax: (703) 888-1930  
jared@binnall.com

A handwritten signature in black ink, appearing to read 'Arun Subramanian'.

*Counsel for Plaintiffs*